

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

**DECLARATION OF ROOPAL P. LUHANA
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Roopal P. Luhana, declare:

1. I am a partner of Chaffin Luhana, LLP, an attorney licensed in the State of New York, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated by Uber as "CONFIDENTIAL" and/or "HIGHLY CONFIDENTIAL", Plaintiff filed the following under seal:

3. Document	Description	Designating Party
Portions of Plaintiffs' Omnibus Motions in Limine	Portions of briefing referring to documents and testimony designated highly confidential and confidential	Uber
Exhibit 5	Gregory Brown 8/26/25 deposition transcript	Uber
Exhibit 6	Rebuttal Expert Report of Vida Thomas	Uber
Exhibit 7	UBER JCCP MDL 003348796	Uber
Exhibit 8	Gregory Brown 7/15/25 deposition transcript	Uber
Exhibit 9	Exhibit 1831, Tab 3 to the deposition of Jamie Brown	Uber
Exhibit 15	Uber's Responses and Objections to 3 rd Interrogatories	Uber
Exhibit 16	Uber's Responses and Objections to 3 rd Requests for Production	Uber

3. Document	Description	Designating Party
Exhibit 17	Henry (Gus) Fuldner 4/29/25 deposition transcript	Uber
Exhibit 18	Sachin Kansal 5/28/25 deposition transcript	Uber
Exhibit 19	Meghan Joyce 2/26/25 deposition transcript	Uber
Exhibit 20	Determinations of Special Master Barbara Jones, 3/17/25	Uber
Exhibit 21	Determinations of Special Master Barbara Jones, 4/2/25	Uber
Exhibit 22	Determinations of Special Master Barbara Jones, 11/10/25	Uber
Exhibit 23	Determinations of Special Master Barabara Jones, 12/4/25	Uber
Exhibit 24	UBER_JCCP_MDL_005239726, UBER_JCCP_MDL_005354493, UBER_JCCP_MDL_003272500	Uber
Exhibit 25	Mariana Esteves 8/28/25 deposition transcript	Uber
Exhibit 26	Hannah Nilles 7/23/25 deposition transcript	Uber
Exhibit 27	Andi Pimentel 3/27/25 deposition transcript	Uber
Exhibit 29	UBER_JCCP_MDL_000911254	Uber
Exhibit 30	Exhibit 2041 to the 10/1/25 deposition of Emilie Boman	Uber
Exhibit 31	Emilie Boman 10/1/25 deposition transcript	Uber
Exhibit 32	UBER000231789	Uber
Exhibit 33	Michael Akamine 5/20/25 deposition transcript	Uber
Exhibit 34	Kate Parker 2/14/25 deposition transcript	Uber
Exhibit 35	Sunny Wong 4/16/25 deposition transcript	Uber
Exhibit 36	Rebecca Payne 4/2/25 deposition transcript	Uber
Exhibit 37	Katherine McDonald 4/24/25 deposition transcript	Uber
Exhibit 38	UBER_JCCP_MDL_001687315	Uber
Exhibit 39	Hannah Nilles 5/29/25 deposition transcript	Uber
Exhibit 40	Hannah Nilles 6/30/25 deposition transcript	Uber
Exhibit 41	Roger Kaiser 11/19/24 deposition transcript	Uber
Exhibit 42	Todd Gaddis 7/8/25 deposition transcript	Uber
Exhibit 44	Nairi Hourdajian 2/7/25 deposition transcript	Uber
Exhibit 45	UBER_JCCP_MDL_004910959	Uber
Exhibit 46	Heather Childs 6/5/25 deposition transcript	Uber
Exhibit 47	Troy Stevenson 10/21/24 deposition transcript	Uber
Exhibit 48	UBER_JCCP_MDL_004842329	Uber
Exhibit 49	UBER_JCCP_MDL_004647390	Uber
Exhibit 50	UBER_JCCP_MDL_005549945	Uber
Exhibit 51	UBER_JCCP_MDL_000562747	Uber
Exhibit 52	UBER_JCCP_MDL_001636569	Uber
Exhibit 53	UBER_JCCP_MDL_005207782	Uber
Exhibit 54	UBER_JCCP_MDL_005207788	Uber
Exhibit 55	QS_0000055	Uber

3. Document	Description	Designating Party
Exhibit 56	UBER JCCP MDL 005154815	Uber
Exhibit 57	UBER JCCP MDL 003255312	Uber
Exhibit 58	UBER JCCP MDL 003359920	Uber
Exhibit 59	UBER JCCP MDL 005579342	Uber
Exhibit 60	UBER JCCP MDL 002658984	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 16, 2025 in Pittsburgh, Pennsylvania.

/s/ Roopal P. Luhana
Roopal P. Luhana